

UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

FILED

FEB 26 2019

Mark C. McCartt, Clerk
U.S. DISTRICT COURTIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Keyport Self Storage, 10 West 71st Street, Tulsa,
Oklahoma 74132, Unit 00E16, The Northern Most
Unit, Fourth Unit From The East End Of The Building

Case No. 19-mj-47-FHM

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment "A":

located in the Northern District of Oklahoma, there is now concealed (identify the person or describe the property to be seized):

See Attachment "B"

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

18 U.S.C. § 922(a)(1)(A)

Engaging, Manufacturing, Dealing, and Selling Firearms Without a License

The application is based on these facts:

See Affidavit of SA Lucas Keck, ATF, attached hereto.

- ☒ Continued on the attached sheet.
☐ Delayed notice of ____ days (give exact ending date if more than 30 ____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Lucas Keck

Applicant's signature

SA Lucas Keck, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: February 26, 2019

Frank H. McCarthy

Judge's signature

City and state: Tulsa, Oklahoma

Frank H. McCarthy U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

THE LOCATION TO BE SEARCHED IS DESCRIBED AS A STORAGE UNIT WITH A RED DOOR. THERE IS A SMALL WHITE SIGN ABOVE THE DOOR WITH "E-16" PRINTED ON THE SIGN. THE STORAGE UNIT IS LOCATED AT KEYPORT SELF STORAGE, 10 W. 71ST ST, TULSA, OK 74132. THE BUILDING WITH UNIT 00E16 IS ON THE NORTHERN MOST ROW, THE FOURTH UNIT FROM THE EAST END OF THE BUILDING.



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

SEARCH WARRANT AFFIDAVIT

I, Lucas Keck, a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), being duly sworn, depose and state as follows:

1. I am currently assigned to the ATF Tulsa Field Office in the Northern Judicial District of Oklahoma. I have been employed by ATF since 2015, and prior to my employment with ATF I was a Special Agent with the United States Secret Service (USSS) from 2009 through 2015. During my employment with the USSS, I conducted and participated in investigations for counterfeit currency, to include: purchasing counterfeit currency with confidential informants and undercover agents, identity theft investigations, credit card fraud, and bank fraud in both state and federal courts in the Southern District of Texas. During my employment with ATF and with the USSS, I have assisted other agencies and law enforcement, to include the Drug Enforcement Administration (DEA), with investigations regarding firearms and narcotics.

2. As a result of my training and experience as an ATF Special Agent, I am familiar with certain federal criminal laws and understand that it is a violation of Title 18, United States Code, Section 922(a)(1)(A), except a licensed importer, licensed manufacturer, or licensed dealer, to engage in the business of importing, manufacturing, or dealing in firearms, or in the course of such business to ship, transport, or receive any firearm in interstate or foreign commerce

3. Based on my experience and specialized training and information I have received from law enforcement agencies, including other Federal, State and Local law enforcement agencies involved in the investigation there is probable cause to believe that violations of Title 18 United States Code, § 922(a)(1)(A), have been committed, are being committed, and will be committed by Matthew GREEN and other unknown person or persons. There is also probable

cause to search storage unit 00E16, at Keyport Self Storage, 10 W. 71st St., Tulsa, OK 74132, Tulsa, Oklahoma, Tulsa County, Northern District of Oklahoma for evidence of these crimes as further described in Attachment B.

BACKGROUND OF INVESTIGATION

4. On February 26, 2019, the Tulsa Police Department Crime Gun Unit executed a search warrant at 2609 S. Trenton Ave., Tulsa, Oklahoma, for first degree burglary. This is the residence of Michael GREEN. During the search of GREEN's residence, items consistent with the manufacturing of firearms was discovered. These items included tools to assemble AR-15 style firearms, AR-15 style components, ammunition, and reloading equipment.

5. In addition to the burglary search warrant, TPD CGU had received tips that GREEN was manufacturing AR-15 style rifles that were considered "ghost guns." These firearms are built from incomplete AR-15 style lower receivers that require drilling and manufacturing to complete. These "ghost guns" are not required to be marked, and are difficult for law enforcement to trace when recovered in crime scenes.

6. After the firearms items were found in GREEN's residence, TPD CGU conducted an interview with GREEN. After waiving his Miranda Warning, GREEN admitted that he rented a storage unit that contained firearms components such as barrels, triggers, and other items to complete firearms. GREEN admitted that at one time he was a manufacture of firearms from 80% complete lower receivers and sold these items on Amazon and other online venues to persons across the United States.

7. TPD CGU discovered paperwork that showed GREEN was renting a storage unit at Keyport Self Storage, 10 W. 71st St, Tulsa, OK 74132, unit 00E16.

UK
FHM

On February 22, 2019, ATF SA Brett Williams conducted a search of the ATF licensing system for Matthew Todd Green. The search revealed no manufacturing license or any license for Matthew Todd Green.

8. Based on my training and experience, your Affiant knows that people engage in the business of manufacturing and selling firearms without a license, utilize cellular phone devices, laptops, calendars, cameras, thumb drives, and other storage devices for communication and storage of transactions. The devices are used to take and receive pictures of products for sale, take and receive calls, emails and messages from the potential purchasers. These communications and devices can contain and store; meeting location, types of firearms wanted, pictures of firearms desired and purchased, messages detailing money transfers and or bank accounts for the purchase of the firearms and locations to purchase the firearms. These communications can be done through the device and its installed apps that can only be viewed on the phone, laptop, computer or other devices sending or receiving.

9. Pursuant to 18 U.S.C. § 922(a)(1)(A), It shall be unlawful, for any person, except a licensed importer, licensed manufacturer, or licensed dealer, to engage in the business of importing, manufacturing, or dealing in firearms, or in the course of such business to ship, transport, or receive any firearm in interstate or foreign commerce.

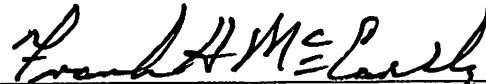
CONCLUSION

10. Based on the foregoing, I believe there is probable cause to search Unit 00E16, Keyport Self Storage, 10 W. 71st St., Tulsa, OK 74132, Tulsa, Tulsa County, Northern District of Oklahoma, for a violation of Title 18 United States Code, § 922(a)(1)(A).



Lucas Keck
Special Agent
Bureau Of Alcohol, Tobacco,
Firearms & Explosives

Subscribed and sworn before me this 26th day of February, 2019



Frank H. McCarthy
United States Magistrate Judge

ATTACHMENT B

Items to be Seized

The items to be seized at all locations include the following:

1. Any firearm including a starter gun which will or is designed to or may readily be converted to expel a projectile by the action of an explosive, the frame or receiver of any such weapon, any firearm muffler or firearm silencer, or any destructive device.
2. Any ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.
3. Any receipts for the purchase of firearms, ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.
4. Any items consistent with the manufacturing of firearms, such as firearms components to complete lower receivers, tools, jigs, and uncompleted firearms components such as 80% lower receivers and uncompleted upper receivers for AR-15 style rifles.
5. Business and/or personal records of firearms transactions and financial records and other records or documents reflecting firearms activity or the disposition of firearms proceeds including, but not limited to the following:
 - Retained copies of federal, state and local corporate, partnership, business and personal income tax returns; Forms W-2, Forms 1099; tax records; any

supporting documentation and attachments; and any correspondence to/from taxing agencies;

- Notes of financial transactions or firearms transactions;
- Correspondence, including electronic mail transmissions, letters, faxes and notes, relating to financial transactions or firearms transaction, including the identification of customers, suppliers, associates partners and co-conspirators.
- Bank records, including deposit slips, cancelled checks, withdrawal slips, and account statements, investment records, including brokerage statements, or credit and debit card records;
- Currency, bank checks, cashier's checks, prepaid access devices, negotiable financial instruments, wire transfer documentation, money orders, stocks bonds, precious metals, or real estate records; or worksheets, tally sheets or ledger sheets reflecting or accounting for money received, disbursed or exchanged;
- Financial statements, income statements, balance sheets, cash receipts, cash disbursements, payroll, inventory and journals and records; and any supporting work papers, schedules, attachments or documents;
- Bills and invoices, including sales, purchases, and expenses;
- Records of financial payments paid and received;
- Mortgage or loan records payable or receivable, and insurance records;
- Records and keys of storage facilities owned or rented;

- Records of business filings or licenses;
 - Records of personal and business expenses;
 - Safe deposit records and keys;
 - Post office box records;
 - Equipment rental records and other lease and rental agreements;
 - Transportation records, including but not limited to, accounts, bills, receipts and invoices, bills of lading, airway bills, freight bills, air cargo bills, dispatch records, logs, manifests, shipping documents and invoices;
 - Credit applications, credit card statements and receipts;
 - Paper tickets, notes, schedules, receipts, or other items relating to travel;
6. Cellular phone, cellular and landline telephone statement and records;
7. Records that identify customers, suppliers, associates, partners or co-conspirators, including, but not limited to, address books, telephone books, rolodexes, telephones, pagers or personal digital assistants and/or smart phones with stored telephone information, notes reflecting telephone and pager numbers, photographs (to include still photos, digital photos, negatives, movies, slide, video tapes and undeveloped film), and audiotape or digital recordings of conversations, including those made over telephone answering machines or digital voicemail;
8. Identification documents and representative exemplars of original handwriting samples;

9. Indicia of occupancy, residency, or ownership of the premise, property or vehicles, including keys, photographs, or documents;
10. Documents showing custody and control of the residence or room where evidence is seized, including, but not limited to, utility or other bills, driver's licenses, and other handwritten notes or other correspondence addressed to or from the occupants of the residence or room;
11. Any calendars, notes, passwords, or dictionary entries;
12. Any Global Positioning Satellite (GPS) entries, Internet Protocol Connections, Location entries to include Cell Tower and WiFi entries;
13. Computers, flash/jump drives, computer hard drives, external hard drives, discs, etc. and other storage devices that can be used to save/store information, to include the off-site viewing and copying of such files or devices;
14. Safes, combination or key-lock strong boxes or other secure storage containers, suitcases, locked cabinets and other types of locked or closed containers, and hidden compartments that may contain any of the foregoing;
15. Any manufacturing equipment used to manufacture firearms to include but not be limited to drill presses, finishing fixtures (JIGS), common hand tools (drills, routers, drill bits etc.), milling machines and CNC machines.

As all of the above described property constitutes evidence of the commission of a criminal offense, is contraband, the fruits of crime or things otherwise criminally

possessed and/or is property designed or intended for use or which is or had been used as a means of committing a criminal offense.